

# **EXHIBIT B**

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**From:** jgaddy  
**Sent:** Monday, July 9, 2018 4:19 PM  
**To:** Kate Swift; Kaspar Stoffelmayr  
**Cc:** Shkolnik, Hunter; Badala, Salvatore C.; Joseph L. Ciaccio; Dunning, Laura; ppoerschke; Mougey, Peter; Gay, Josh  
**Subject:** Opioid MDL - Search Terms and Custodians  
**Attachments:** 2018-07-09 - Walgreens Search Terms - Edits.docx

Kate,

I've attached, in redline format, our edits to the search terms you proposed last week. Please confirm these are acceptable to you, and that you will begin running the amended search terms.

Regarding potential custodians, we first note that Walgreens is better situated to identify relevant custodians and that the below list is by no means meant to be interpreted as excluding any relevant custodians or positions that should be provided. Secondly, this process could be accomplished much more efficiently if Walgreens would provide us with organizational charts. It is confusing to us that Walgreens claims to not have any document that identifies the name and territory of employees filling positions such as District Loss Prevention Officers, Distribution Center Directors, or CII Function Managers, to name a few.

That said, at a minimum we believe any individuals filling the following the positions from 2006 to the present whose duties impact any activity in Ohio, Florida, Pennsylvania, West Virginia, Illinois, Kentucky, and Georgia may make appropriate custodians:

- District Pharmacy Supervisors
- CII Function Managers
- Market Loss Prevention Directors
- District Loss Prevention Officers
- Distribution Center Directors
- Distribution Center Compliance Officers
- Replenishment Buyers
- Market Pharmacy Directors
- Compliance Officers
- Internal Auditors
- Managers, Rx Inventory Drug Stores

We would like to set a meet and confer to discuss these issues as well as the scheduling of 30(b)(6) depositions as soon as possible. We are available tomorrow from 11:00ET to 4:00ET. Please let us know what time works for you.

**Jeff Gaddy**

*Attorney*

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